

300-VS

George L. 1/4/00



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December 22, 1999

United States Environmental Protection Agency  
Office of Pesticide Programs  
Registration Division(7505C)  
Document Processing Desk (CORR)  
Room 266A, Crystal Mall 2  
1921 Jefferson Davis Highway  
Arlington, VA 22202

Attention: Mr. George T. LaRocca  
Product Manager 13

Dear Mr. LaRocca:

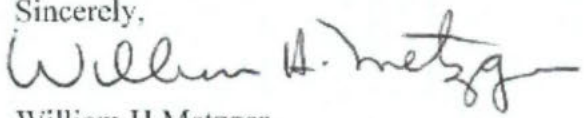
**Subject: Chemsico Insect Bait A  
EPA Registration Number 9688-134  
Proposed Consumer Use Testing**

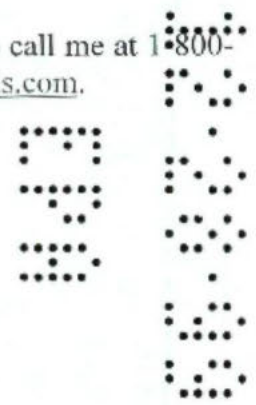
Dear Mr. LaRocca:

Attached for your review and comment is a proposed test protocol for additional consumer testing of Chemsico Insect Bait A. As we discussed with you and Kevin Sweeney in your offices on November 10, 1999, this test is designed to determine the ability for consumers to read and understand the label approved by you on July 15, 1999.

We would like to initiate this testing in early January, 2000. Your input and suggestions are welcome, but if we could receive them as soon as possible it will expedite the initiation of the test.

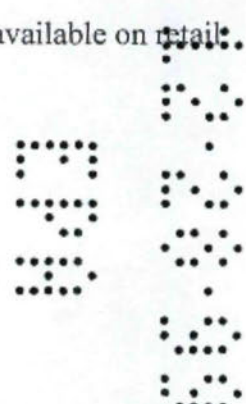
If you have any questions, comments or need more information, please call me at 1-800-242-1166 extension 3227 or via E-mail at [bill\\_metzger@spectrumbrands.com](mailto:bill_metzger@spectrumbrands.com).

Sincerely,  
  
William H Metzger  
Vice President, Regulatory Affairs



**Proposed Test Protocol**  
**Consumer Application of Chemsico Insect Bait A**  
**EPA Reg. No. 9688-134**

1. Study: Consumer Application of Chemsico Insect Bait A,  
EPA Reg. No. 9688-134 under actual use conditions
2. Purpose: To determine the ability of consumers to read and  
understand the product label directions and to  
properly install and monitor the bait stakes
3. Study Number: 00-01-XX (to be determined at Study Initiation)
4. Testing Locations: Consumer application will take place in FL, TX,  
CA and MO. Exact geographical areas will be  
determined at test initiation and detailed in the final  
report.
5. Study Sponsor: United Industries Corp.  
8825 Page Blvd.  
St. Louis, MO 63114
6. Test Substance: Spectracide® Terminate, EPA Reg. No. 9688-134-  
8845.
7. Test Substance Identification: Commercially produced material available on retail  
store shelves.
9. Proposed Start Date: 1/15/00
10. Proposed End Date: 5/15/00





**Proposed Test Protocol**  
**Consumer Application of Chemsico Insect Bait A**  
**EPA Reg. No. 9688-134 (page 2)**

11. Proposed Study Completion: 6/1/00  
Date (Final Report Issued)

12. Proposed Experimental Design:

**A) Identification of Study Participants**

Consumers indicating an intent to purchase Spectracide Terminate at a retail outlet will be offered the opportunity to participate in a product use study. Those consumers interested in participating will be reimbursed for the purchase price of the product. The study objective is to obtain 50 consumers in each of the indicated states (a total of 200 consumers) to participate in the study.

**B). Initial Product Use**

Approximately two weeks after the study participants have been identified they will be contacted by telephone. During the phone interview it will be determined if the product has been installed. If the participant has installed the product an appointment will be scheduled for a personal interview regarding product use. If the consumer has not yet installed the product they will be asked if they still wish to participate in the study. If so, they will be re-contacted in another two weeks to determine if the installation was completed.

**C.) On-Site Interview**

During the on-site interview the participant will be asked if they had any difficulty reading the product label and understanding the directions for use. Following this brief interview an inspection will be made to determine how the stakes were applied. Specifically, the following information will be obtained:

- date the stakes were installed.
- square footage of the structure.
- number of stakes installed around the structure.
- distance between installed stakes and foundation.
- distance between installed stakes.
- stakes installed in critical areas (according to label directions), yes or no.

**D.) Follow-up Interview**

Three months after the date of stake installation study participants will be re-contacted by telephone to determine if they have monitored/inspected the installed bait stakes for signs of termite activity. Information will be obtained as to the approximated date(s) of inspection and the results of the inspection.

**Proposed Test Protocol**  
**Consumer Application of Chemsico Insect Bait A**  
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After this second interview the study participants will be informed that the study has been completed and they will not be contacted further in connection with Terminate. They will be reminded to continue to use the product according to label directions.

13. Records to be maintained:      Data will be obtained according the form attached in Appendix A and will be archived, along with the original copy of the final report, in the United Industries data archive.
14. Study Conduct:                      This study will not be conducted according to Good Laboratory Practice Guidelines.

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**Proposed Test Protocol**  
**Consumer Application of Chemsico Insect Bait A**  
**EPA Reg. No. 9688-134 (Appendix—Data Collected)**

**A. On-Site Interview**

- 1) Name of Participant (will be coded in final report to protect participant privacy)
- 2) Address of Participant
- 3) Square Footage of Structure
- 4) Date of Product Installation
- 5) Number of Stakes Installed
- 6) Distance Between Stakes and Foundation (Feet)
- 7) Distance Between Installed Stakes (Feet)
- 8) Stakes Installed in Critical Areas (as defined in label directions) (Yes/No)

**B. Follow-Up Interview**

- 1) Date Stakes Were Monitored/Inspected
- 2) Signs of Termite Activity During Monitoring (Yes/No)
- 3) Placement of Additional Stakes After Monitoring (Yes/No)

